UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MICHIGAN

UNITED STATES OF AMERICA,

Plaintiff,

Case No. 18-Cr-20495

٧.

HON. DAVID M. LAWSON

IBRAHEEM IZZY MUSAIBLI, aka Abu Shifa Musaibli, aka Abu 'Abd Al-Rahman Al-Yemeni,

Defendant.

UNITED STATE'S MOTION TO DESIGNATE A CLASSIFIED INFORMATION SECURITY OFFICER

The United States of America respectfully requests that the Court designate a Classified Information Security Officer ("CISO"), 1 pursuant to the Classified Information Procedures Act, 18 U.S.C. App. III ("CIPA") and Section 2 of the Security Procedures established under Pub. L. 96-456, 94 Stat. 2025 by the Chief Justice of the United States and promulgated pursuant to Section 9 of CIPA. In support of its motion, the Government states the following:

¹ In the original Security Procedures, the title of the position was Court Security Officer. In the revised security procedures promulgated by Chief Justice Roberts, the position is now known as Classified Information Security Officer.

- 1. The government has been working diligently to determine if it will need to submit a classified filing in this case. Although that work is still underway, as a contingency and in order to reduce the possibility of delay in the proceedings, the government believes that it would be worthwhile to take the steps necessary to enable the Court and court personnel to handle classified information.
- 2. To that end, and in order to assist the Court and court personnel in the handling of any motions that may be filed pursuant to CIPA and implementing any orders relating to classified matters, the Government requests that the Court designate Debra Randall-Guerrero as the CISO for this case, to perform the duties and responsibilities prescribed for CISO's in the Security Procedures promulgated by the Chief Justice.
- 3. The government further requests that the Court designate the following persons as Alternate CISOs, to serve in the event Ms. Randall-Guerrero is unavailable: Daniel O. Hartenstine, Joan B. Kennedy, Maura L. Peterson, Carli V.

Rodriquez-Feo, Harry J. Rucker and/or W. Scooter Slade.

Respectfully submitted this 18th day, of September, 2018.

MATTHEW SCHNEIDER United States Attorney

s/Cathleen M. Corken

Cathleen M. Corken Assistant United States Attorney 211 W. Fort Street, Suite 2001 Detroit, MI 48226 Cathleen.corken@usdoj.gov (313) 226-9100

s/Kevin Mulcahy

Kevin Mulcahy Assistant United States Attorney 211 W. Fort Street, Suite 2001 Detroit, MI 48226 Kevin.mulcahy@usdoj.gov (313) 226-9100

CERTIFICATE OF SERVICE

I hereby certify that on September 19, 2018, I electronically filed the foregoing document using the ECF system, which will send notification of filing to the counsel of record.

s/Cathleen M. Corken Assistant U.S. Attorney